

October 19, 2016 (Treasury).¹ Since that time, the undersigned attorney and attorneys for each agency have been working diligently to assemble the administrative record and assess the defenses and positions of each agency under the law and based on the facts.

4. Because the action involves claims by two different plaintiffs against two separate agencies, the government requires additional time to formulate its response to the Complaint.

5. Further, the undersigned attorney will be on leave from December 23, 2016 through January 2, 2017.

6. For these reasons, Defendants respectfully request an extension to January 6, 2017 to answer or otherwise respond to the Complaint.

7. Plaintiffs assent to the requested extension.

WHEREFORE, Defendants respectfully request that the Court extend the time to answer or otherwise respond to the Complaint to January 6, 2017.

Respectfully submitted,

CARMEN M. ORTIZ
United States Attorney

By: /s/ Jessica P. Driscoll
Jessica P. Driscoll, BBO No. 655394
Assistant United States Attorney
United States Attorney's Office
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 9200
Boston, MA 02210
(617) 748-3398
Jessica.Driscoll@usdoj.gov

Dated: November 14, 2016

¹ Based on the summonses filed by the Plaintiffs, the Court entered an answer deadline of November 29, 2016 (Document Nos. 11 and 12). Respectfully, if the Court declines to grant this motion, Defendants request that the answer deadline be amended to December 5, 2016, which is the Monday following December 3, 2016 (sixty days from the date the U.S. Attorney's Office *received* the original complaint).

Local Rule 7.1 Certificate

I hereby certify that I contacted Plaintiffs' attorneys, Alec Harris and Eileen Connor, who indicated that Plaintiffs assent to the requested extension.

/s/ Jessica P. Driscoll

Jessica P. Driscoll

Assistant United States Attorney

Dated: November 14, 2016

CERTIFICATE OF SERVICE

I, Jessica P. Driscoll, Assistant United States Attorney, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants by First Class Mail.

/s/ Jessica P. Driscoll

Jessica P. Driscoll

Assistant United States Attorney

Dated: November 14, 2016